R-1A PART A
CORRESPONDENCE

International Fuel Cells

195 Governors Highway
P.O. Box 739
South Windsor
Connecticut 06074

APR 29 1986

April 15, 1986

U.S. Environmental Protection Agency
CT/ME Waste Management Branch
J.F.K. Federal Building
Room 1903
Boston, MA 02203

Attention: Connecticut Reversion Analyst

References: 1. E.P.A. ID No. CTD010166791
2. Letter, Walrond to Pac, 1/25/85, Enclosed.
3. Letter, Walrond to Pac, 4/11/85, Enclosed.

Enclosed is a RCRA Form 3 which is a revised version of the Form 3 submitted in 1980. This revision is to advise you of a facility name change.

In April, 1985 the name of the facility changed from:

United Technologies Corporation
Power Systems Division
P.O. Box 109
South Windsor, CT 06074

To: International Fuel Cells
195 Governor's Highway
P.O. Box 739
South Windsor, CT 06074

The name change was reported to the State of Connecticut (References 2 and 3) as was all information regarding hazardous waste management at that time. Please note that there has been no change in the ownership of the property, the responsible operator, or the overall hazardous waste management activity.

Also please note that in the Form 3 revision, some quantities and capacities have been updated to reflect experience and current activity. Should you have any questions regarding International Fuel Cells Hazardous Waste Management, please contact me at (203)727-2413.

Sincerely,

INTERNATIONAL FUEL CELLS

Alan L. Walrond

A. L. Walrond
Hazardous Waste Management
Coordinator

/f
Encl.

Facsimile: (203) 727-2319 TWX: 710-425-0137 Telex: 681-3166

INTERNATIONAL FUEL CELLS

P. O. Box 739
195 Governors Highway
South Windsor, Connecticut 06074

FACSIMILE: (203)727-2319
TWX: 710-425-0137
TELEX: 681-3166

April 11, 1985

Mr. Stanley J. Pac, Commissioner
State of Connecticut
Department of Environmental Protection
State Office Building
Hartford, CT 06115

Reference: Letter from A. L. Walrond, United Technologies, to S. J. Pac, State of Connecticut, dated January 25, 1985.

Dear Mr. Pac:

The reference letter advised you that in the second quarter 1985 the name of the company operating the facility in South Windsor, Connecticut would be changed.

Please be advised that the name has been changed from:

UNITED TECHNOLOGIES CORPORATION
Power Systems Division
P. O. Box 109
South Windsor, CT 06074

To:

International Fuel Cells
195 Governor's Highway
P. O. Box 739
South Windsor, CT 06074

All activities remain as stated in the reference letter.

Sincerely,

International Fuel Cells

Alan L. Walrond

A. L. Walrond
Hazardous Waste Coordinator

/f

UNITED TECHNOLOGIES POWER SYSTEMS

P O Box 109
South Windsor, Connecticut 06074

January 25, 1985

Mr. Stanley J. Pac, Commissioner
State of Connecticut
Department of Environmental Protection
State Office Building
Hartford, CT 06115

Dear Mr. Pac:

The U.S. Environmental Protection Agency issued Hazardous Waste Management I.D. Number CTD 010166791 to:

United Technologies
Power Systems Division
P.O. Box 109
South Windsor, CT
06074

It is expected that in the second quarter, 1985, the name of the company operating the facility will be changed to International Fuel Cells Corporation. This name change will result from the establishment of a joint venture company by United Technologies Corporation and Toshiba Corporation.

There will be no change in the address, ownership of the property, the responsible management or the Facility Contact.

Also, the product, method of manufacture, types of hazardous wastes, and established procedures for generating, storing, and shipping of the hazardous wastes will remain the same.

After the name change, we plan to use the same E.P.A. I.D. number for all phases of hazardous waste management.

Please advise me if this is not satisfactory.

Sincerely,
UNITED TECHNOLOGIES CORPORATION
Power Systems Division

A. L. Walrond

A. L. Walrond
Hazardous Waste Management
Coordinator
Fuel Cell Operations

/f

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	C	T	D	0	1	0	1	6	6	7	9	1		1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	64	03	15

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S													T/A	C
C	D	U	P											1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	7520	G		7				
2	S02	2975	G		8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE, INCLUDE DESIGN CAPACITY.

NONE

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing ... have more than 26 wastes to list.

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EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY												
S												T/A	C		S										T/A	C	
W	C	T	D	0	1	0	1	6	6	7	9	1		1	W	D	U	P								2	DUP
1	2											13	14	15	1	2									13	14	15	23 - 26

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 29	27 - 29	27 - 29	27 - 29	
1	D001	10,000	P	S01				
2	D002	1,500	P	S01				
3	D002	9,000	P	S02				
4	F002	4,000	P	S01				
5	P022	50	P	S01				
6	P118	50	P	S01				
7	U002	50	P	S01				
8	U013	65	P	S01				
9	U056	10	P	S01				
10	U140	50	P	S01				
11	U154	203	P	S01				
12	U159	20	P	S01				
13	U165	100	P	S01				
14	U188	6,000	P	S01				
15	U219	10	P	S01				
16	U220	50	P	S01				
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F	C	T	D	0	1	0	1	6	6	7	9	1	T/A	C
														6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 50 000	072 36 030

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E SHEPARD-POLA, INCORPORATED	203-289-6414

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F P.O. BOX 415	G EAST WINDSOR HILL	CT	06028

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J. E. SHEPARD III	J E Shepard III	22 Jan 86

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
WILLIAM H. PODOLNY CHAIRMAN	Wm H Podolny	

Continued from page 4.

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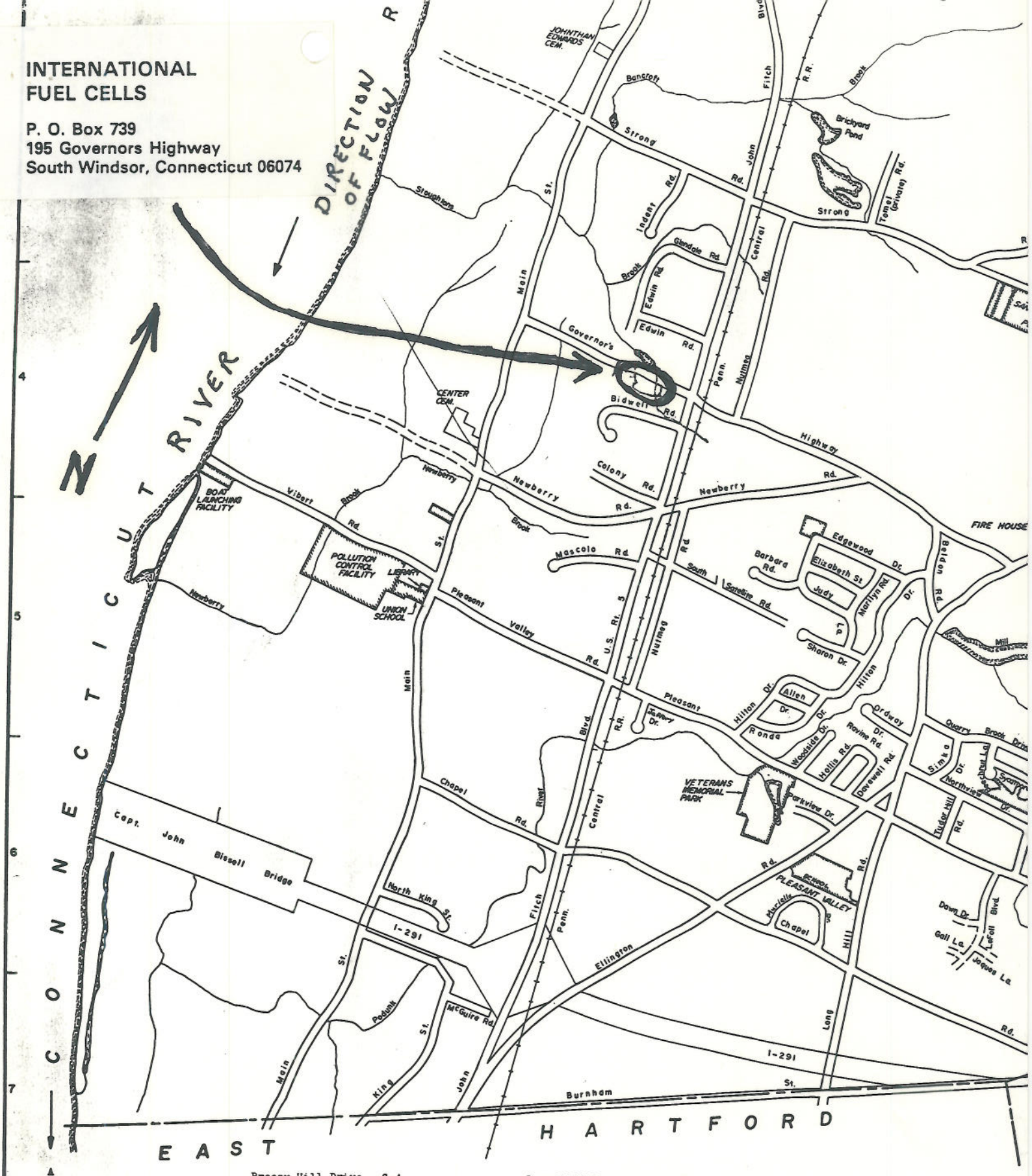
V. FACILITY DRAWING *(see page 4)*

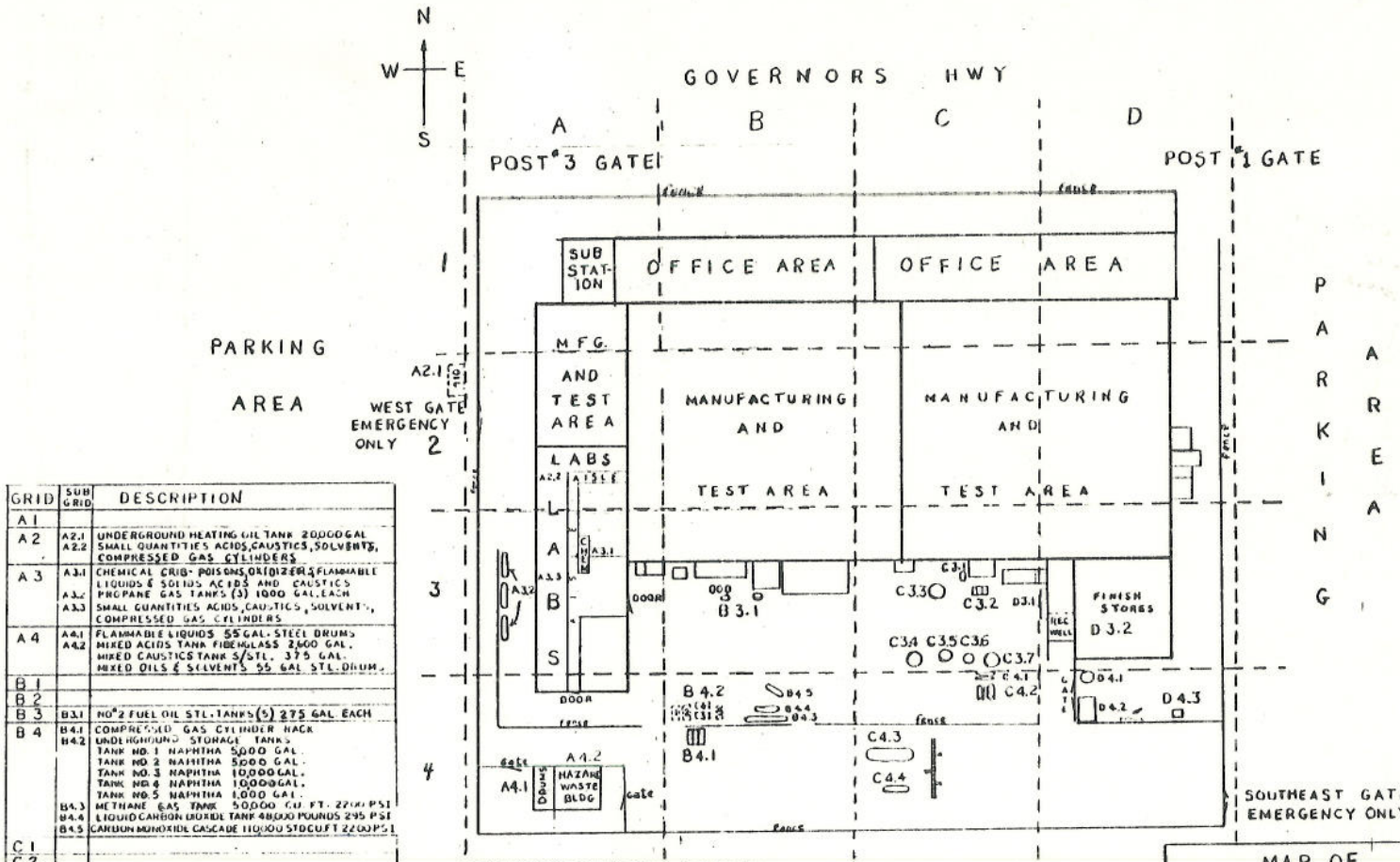
SEE ATTACHED MAP.

SEE ATTACHED FACILITY LAYOUT DATED 03-04-86.

INTERNATIONAL FUEL CELLS

P. O. Box 739
195 Governors Highway
South Windsor, Connecticut 06074





GRID	SUB GRID	DESCRIPTION
A 1		
A 2	A2.1	UNDERGROUND HEATING OIL TANK 20,000 GAL
	A2.2	SMALL QUANTITIES ACIDS, CAUSTICS, SOLVENTS, COMPRESSED GAS CYLINDERS
A 3	A3.1	CHEMICAL CRIB- POISONS, OXIDIZERS, FLAMMABLE LIQUIDS & SOLIDS ACIDS AND CAUSTICS
	A3.2	PROPANE GAS TANKS (3) 1000 GAL. EACH
	A3.3	SMALL QUANTITIES ACIDS, CAUSTICS, SOLVENTS, COMPRESSED GAS CYLINDERS
A 4	A4.1	FLAMMABLE LIQUIDS 55 GAL. STEEL DRUMS
	A4.2	MIXED ACIDS TANK FIBERGLASS 2,600 GAL.
		MIXED CAUSTICS TANK S/STL. 375 GAL.
		MIXED OILS & SELVENTS 55 GAL STL. DRUM.
B 1		
B 2		
B 3	B3.1	NO. 2 FUEL OIL STL. TANKS (5) 275 GAL EACH
B 4	B4.1	COMPRESSED GAS CYLINDER RACK
	B4.2	UNDERGROUND STORAGE TANKS
		TANK NO. 1 NAPHTHA 5,000 GAL.
		TANK NO. 2 NAPHTHA 5,000 GAL.
		TANK NO. 3 NAPHTHA 10,000 GAL.
		TANK NO. 4 NAPHTHA 10,000 GAL.
		TANK NO. 5 NAPHTHA 1,000 GAL.
	B4.3	METHANE GAS TANK 50,000 CU FT. 2200 PSI
	B4.4	LIQUID CARBON DIOXIDE TANK 48,000 POUNDS 295 PSI
	B4.5	CARBON MONOXIDE CASCADE 110,000 STDCUFT 2200 PSI
C 1		
C 2		
C 3	C3.1	NO 2 FUEL OIL TANK STL. 275 GAL
	C3.2	COMPRESSED GAS CYLINDER RACK
	C3.3	LIQUID NITROGEN TANK 13,000 GAL 150 PSI
	C3.4	LIQUID CARBON DIOXIDE TANK 100,000 POUNDS 175 PSI
	C3.5	LIQUID OXYGEN TANK 1596 GAL 150 PSI
	C3.6	LIQUID NITROGEN TANK 600 GAL 300 PSI
	C3.7	LIQUID NITROGEN TANK 3000 GAL 300 PSI
C 4	C4.1	NITROGEN CASCADE 20,000 STD CUFT 2200 PSI
	C4.2	OXYGEN GAS TUBE TRAILERS (2) 60,000 STD CUFT EA.
	C4.3	LIQUID NITROGEN TANK 20,000 GAL 50 PSI
	C4.4	HYDROGEN CASCADE 91,000 STD CUFT 2000 PSI

D 1		
D 2		
D 3	D3.1	COMPRESSED GAS CYLINDER RACK
	D3.2	FINISH STORES ACIDS CAUSTICS SMALL QUANTITIES AEROSOLS, FLAM. LIQUIDS LARGE QTY. COMBUSTIBLES
D 4	D4.1	LIQUID ARGON TANK 900 GAL 150 PSI
	D4.2	METAL SHED CORROSIVE SOLIDS 55 GAL STL. DRUMS
	D4.3	METAL SHED FLAMMABLE LIQUIDS GAL. BOTTLES ALCOHOL - FIVE GAL. METAL CANS MISC. FLAMMABLE LIQUIDS

MAP OF
INTERNATIONAL FUEL CELLS
195 GOVERNORS HIGHWAY
SO. WINDSOR CT. 06074
DATE 3-4-86 SCALE 1"=50 FEET

UNITED TECHNOLOGIES
POWER SYSTEMS DIVISION

November 19, 1980

Environmental Protection Agency
Region I
Permits Branch
P. O. Box 8748
Boston, MA 02114

We submit on behalf of United Technologies Corporation, Resource Conservation Recovery Act (RCRA) Hazardous Waste Permit Application Part A (Forms 1 and 3) covering the operation of United Technologies Corporation at Governors Highway, South Windsor, Connecticut.

Very truly yours,

UNITED TECHNOLOGIES CORPORATION
Power Systems Division

R. F. Thompson
Division Assistant Counsel

/bd

Attach.

UNITED TECHNOLOGIES
POWER SYSTEMS DIVISION

October 3, 1980

Environmental Protection Agency
Region I
Permits Branch
P. O. Box 8748
Boston, MA 02114

Enclosed is the completed Notification of Hazardous Waste Activity (EPA Form 8700-12) covering the operation of United Technologies Corporation in South Windsor, Connecticut. Please excuse our late filing of this Notification; delay in filing was due to the time required to conduct a complete audit of our materials generation and storage activity to assure compliance with the EPA requirements.

Very truly yours,

UNITED TECHNOLOGIES CORPORATION
Power Systems Division

R. F. Thompson
Division Assistant Counsel

/bd

Enc.